

From: "Jim Maag" <jmaag@ksbankers.com> on 01/28/2004 02:50:43 PM
Subject: Equal Credit Opportunity

Jennifer J. Johnson, Secretary
Board of Governors
Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Dear Ms. Johnson:

On behalf of the 360 member banks of the Kansas Bankers Association, we wish to strenuously object to the proposed changes relating to required disclosures for Regulations B, E, M, Z, and DD. One of the greatest challenges that our community banks face on a daily basis is staying abreast of the changes in the voluminous federal and state banking regulations. One out of every four Kansas banks has fewer than 10 employees and over 60% of our banks have fewer than 25 employees thus making it extremely difficult for them to stay in compliance with the myriad of regulations.

Therefore, any changes in existing regulations should have some necessary and compelling reason behind them and these proposals do not. There is simply no logical explanation as to how these changes would actually help the consumer nor has it been demonstrated that the existing disclosures are a problem. On the other hand, the proposed changes would most assuredly increase the costs of compliance, require additional staff time, and further expose banks to potential litigation.

These proposals only create additional burden for banks with no redeeming benefit for banks or their customers. We respectfully request that the Board withdraw the proposed changes to the aforementioned Regulations.

Sincerely,

James S. Maag
President

Kathleen T. Olsen
Associate General Counsel